

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE:	Case No. 19-12486-elf
KRISTIN CLANCEY Debtor	
Freedom Mortgage Corporation, Movant	Chapter 13
vs.	
KRISTIN CLANCEY and Michael Clancey, Rosemarie Cimino, (NON-FILING CO-DEBTOR)	11 U.S.C. §362 and §1301
Respondents	

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Freedom Mortgage Corporation has filed a Motion for Relief from the Automatic Stay with the Court to permit Freedom Mortgage Corporation to Foreclose on 59 North Church Street, Spring City, PA 19475.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before December 07, 2022 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Brock and Scott, PLLC  
8757 Red Oak Boulevard, Suite 150  
Charlotte, NC 28217

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on December 13, 2022 at 9:30 AM in Courtroom #1, United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Dated: November 10 2022

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**  
*Philadelphia Division*

IN RE:  
**KRISTIN CLANCEY**

Case No. 19-12486-elf  
Chapter 13

Freedom Mortgage Corporation,  
Movant

vs.

**KRISTIN CLANCEY ,**  
Debtor

Michael Clancey Rosemarie Cimino  
Co-Debtor

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice Of Motion, Response Deadline And Hearing Date has been electronically served or mailed, postage prepaid on this day to the following:

KRISTIN CLANCEY  
59 N CHURCH ST  
SPRING CITY, PA 19475

Joseph L. Quinn, Debtor's Attorney  
192 South Hanover Street, Suite 101  
Pottstown, PA 19464  
CourtNotices@rqplaw.com

Michael Clancey, Co-Debtor  
113 Ellio Circle  
Royersford, PA 19468

Rosemarie Cimino, Co-Debtor  
110 Pembroke Ct  
Exton, PA 19341

Kenneth E. West, Bankruptcy Trustee  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

United States Trustee , US Trustee  
Office of the U.S. Trustee  
200 Chestnut Street, Suite 502  
Philadelphia, PA 19106

November 14, 2022

*/s/Andrew Spivack*

Andrew Spivack, PA Bar No. 84439  
Matt Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor  
BROCK & SCOTT, PLLC  
8757 Red Oak Boulevard, Suite 150  
Charlotte, NC 28217  
Telephone: (844) 856-6646  
Facsimile: (704) 369-0760  
E-Mail: PABKR@brockandscott.com

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE:  KRISTIN CLANCEY Debtor	Case No. 19-12486-elf
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KRISTIN CLANCEY	11 U.S.C. §362 and §1301
and	
Michael Clancey, Rosemarie Cimino, (NON-FILING CO-DEBTOR)	
Respondents	

**PRAECIPE TO RELIST MOTION FOR RELIEF**

TO THE CLERK, UNITED STATES BANKRUPTCY COURT:

Kindly relist for hearing Movant Freedom Mortgage Corporation's Motion for Relief originally filed with the Court on September 16, 2022.

*/s/Andrew Spivack*  
Andrew Spivack, PA Bar No. 84439  
Matt Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
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